

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2021-21-C - ORDER NO. 2021-407  
JUNE 3, 2021

IN RE: Application of Horry Telephone Cooperative,	)	ORDER DESIGNATING
Incorporated for Designation as an Eligible	)	HORRY TELEPHONE
Telecommunications Carrier in Certain	)	COOPERATIVE, INC. AS
Census Blocks in Georgetown and Marion	)	AN ELIGIBLE
Counties for Purposes of Receiving Federal	)	TELECOMMUNICATIONS
Rural Digital Opportunity Fund ("RDOF")	)	CARRIER
Phase I Support	)	

This matter come before the Public Service Commission of South Carolina ("Commission") on the Application of Horry Telephone Cooperative, Inc. ("HTC" or "Company") for designation as an Eligible Telecommunications Carrier ("ETC") in the State of South Carolina for certain service areas. These certain service areas comprise the eligible census block(s) that have been provisionally awarded to the Company as a winner in the Rural Digital Opportunity Fund ("RDOF") Phase I auction ("Auction 904") through the RDOF Phase I support by the Federal Communications Commission ("FCC").

The Company seeks designation as an ETC pursuant to Section 214(e)(2) of the Telecommunications Act of 1996 ("Telecommunications Act"), as amended, and Section 103-690 of the South Carolina Code of Regulations ("Regulation(s)"). The Company's receipt of RDOF Phase I support is contingent, in part, on receiving an ETC designation from the Commission by June 7, 2021.

As part of its ETC Application, the Company requests waiver of Regulation 103-

690.C.(a)(1)(B), regarding submission of a two-year plan, and Regulation 103-690.1.B.(b)(1), regarding updates to the two-year plan. The Company also requests waiver of Regulation 103-690.C.(b) to the extent it would prohibit designation as an ETC in an area smaller than a wire center. The Company further requests expedited consideration of this matter and waiver of the formal evidentiary hearing.

Upon review of the Application and all of the supporting documents submitted by the Applicant, and for the reasons explained in this Order, the Commission concludes that the Application, together with the requested Regulation waivers, should be approved and that Company is granted the designation as an ETC on the terms provided in this Order. The Commission further concludes that it would serve the public interest to approve the Application and designate the Company as an ETC in the certain service area comprised of the eligible census blocks that have been provisionally awarded to the Company as a winner in Auction 904.

## **I. BACKGROUND**

On January 30, 2020, the FCC established the RDOF plan to ensure continued and rapid deployment of broadband networks to unserved Americans.<sup>1</sup> RDOF will commit up to \$20.4 billion to support the availability of high-speed networks in rural areas of the United States. The FCC released the RDOF Closing Public Notice<sup>2</sup> on December 7, 2020, announcing the conclusion of Phase I of Auction 904. Phase I committed up to \$16 billion

---

<sup>1</sup> See *Rural Digital Opportunity Fund; Connect America Fund*, Order, 35 FCC Red 686 (2020) ("*RDOF Order*").

<sup>2</sup> See *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 2021*, AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90, Public Notice, DA 20-1422 (rel. Dec. 7, 2020) ("*RDOF Closing Public Notice*").

over the next ten years.

The Company filed its verified application ("Application") for designation as an ETC on January 6, 2021. As directed by the Commission, notice of the filing of the Application was published and proof of publication provided to the Commission on February 11, 2021. The South Carolina Office of Regulatory Staff ("ORS") is a statutory party in this matter. See S.C. Code Ann. § 58-4-10(B) (Supp. 2020). No comments or petitions to intervene were received in response to the notice. All interested persons have been afforded an opportunity for a hearing, as required by S.C. Code Ann. § 58-9-280(B), Section 1-23-320(a) of the South Carolina Administrative Procedures Act, and constitutional due process. Proceeding without a formal hearing in this matter would serve the public interest in administrative efficiency.

HTC is an incumbent local exchange carrier ("ILEC") and provides local exchange services, both as an ILEC within its ILEC service area and as a competitive local exchange carrier ("CLEC") outside its ILEC service area, as well as intrastate exchange access service within geographical areas established by the Commission. HTC is an ETC in its ILEC service area.<sup>3</sup> JHTC was previously designated as an ETC in certain census blocks in Georgetown and Marion Counties for purposes of the receipt of federal Connect America Fund Phase II Auction support.<sup>4</sup> HTC has authority to provide service as a CLEC in the areas for which it is seeking ETC designation.<sup>5</sup>

On March 17, 2021, a Stipulation entered into between the Company and the ORS

---

<sup>3</sup> See Commission Order No. 1997-958 in Docket No. 1997-239-C.

<sup>4</sup> See Order No. 2019-48(A) in Docket No. 2018-346-C.

<sup>5</sup> See Order No. 2019-204 in Docket No. 2018-372-C.

was filed with the Commission ("Stipulation"). The Stipulation recommends that the Company be designated as an ETC in accordance with the terms of the Stipulation. A copy of the Stipulation is attached hereto as Order Exhibit A. The Company filed the verified direct testimony of Carlton Lewis in support of the Application on March 4, 2021. The Company was deemed a winning bidder for two hundred seventy-four (274) eligible census blocks in the census block groups identified in Exhibit A to the Application, which is attached as Order Exhibit B. The Commission held oral arguments on March 15, 2021, regarding the Company's request for expedited review, for waiver of a formal hearing to approve the Application, and for waiver of Regulations 103-690.C.(a)(1)(B), 103-690.1.B(b)(1), and 103-690.C.(b). S.C. Code Ann. Regs. 103-690.C.(a)(1)(B), 103-690.1.B(b)(1), and 103-690.C.(b) (2012). ORS did not object to the request for expedited review of the Application and requested waivers conditional upon the executed Stipulation.

Having considered the record before it, the Commission finds that it is sufficient to make a final determination in this matter and that the interests of judicial economy are served by waiving the formal hearing and granting expedited consideration.

## **II. ANALYSIS**

Section 214(e)(2) of the Telecommunications Act authorizes state commissions to designate common carriers that meet the applicable requirements as ETCs. 47 U.S.C.A. § 214(e)(2). Regulation 103-690 provides that the Commission will fulfill its responsibility to designate common carriers as ETCs, and establishes the requirements that an applicant

must meet in order to be designated an ETC for the purpose of receiving federal universal service support pursuant to Section 214(e) of the Telecommunications Act. See, 47 C.F.R. § 214(e) (West) and S.C. Code Ann. Regs. 103-690 (2012).

As demonstrated in the Application, the Verified Testimony and the Stipulation, the Company satisfies all the relevant requirements for designation as an ETC specified in Sections 254 and 214 of the Telecommunications Act and Regulation 103-690. For participation in the RDOF program the Company is a common carrier as defined by 47 U.S.C.A. § 153 (11), and will offer all the voice and broadband internet services supported by federal support mechanisms either using its own facilities or combination of its own facilities and resale of another carrier's services, and advertise the availability of its offerings and charges through media of general distribution. See, 47 C.F.R. § 153(11) The Company has:

- certified that it will comply with the service requirements;
- demonstrated its ability and commitment to remain functional in emergency situations;
- demonstrated its commitment to satisfy applicable consumer protection and service quality standards, including annual certification of its compliance and reporting of consumer complaints in accordance with Regulations 103-690.C(a)(3) and 103-690.1B(b)(4), S.C. Code Ann. Regs. 103-690.C(a)(3) & 103-690.1B(b)(4) (2012);
- demonstrated that the Company is financially and technically capable of providing the service;

- demonstrated that it will provide local usage plans comparable to the incumbent local exchange carriers already operating in the area; and
- committed to comply with applicable federal and state reporting requirements including, but not limited to, submitting reports regarding unfulfilled service requests under Regulation 103-690.1.B.(b)(3) and other annual reports required by Regulation 103-690.1. S.C. Code Ann. Regs. 103-690.1 (2012).

Additionally, in accordance with 47 C.F.R. § 54.101(d) and Regulation 103-690.1.E, the Company will offer voice telephony and broadband Internet access service to low-income consumers in the RDOF designated service area. See, 47 C.F.R. § 54.101(d) (West) and S.C. Code Ann. Regs. 103-690.1 (2012).

Considering these factors and others, the Commission determines that it is in the public interest that the Commission grant the Company designation as an ETC for the purpose of providing voice telephony and broadband Internet access services.

### **III. FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1. The Application, pre-filed testimony and Stipulation are accepted into the record without objection.

2. Since this matter is uncontested, ORS does not oppose the Application and waivers, and the Company otherwise meets the requirements for designation as described below, expedited review should be granted.

3. The Company meets all federal and state requirements for designation as an ETC in the proposed areas where it seeks designation, with the exception of those

requirements for which waiver is requested and specifically granted, as included herein.

4. The Commission grants the Company's request for a waiver of the requirement to file a two-year plan describing proposed improvements or upgrades to its network. The Commission may waive a rule or regulation where circumstances indicate that a waiver is appropriate, upon a finding that such waiver is not contrary to the public interest. In lieu of filing the two-year plan provided for in Regulation 103-690.C.(a)(1)(B), the Company shall make available all reports it is required to file with the FCC in connection with RDOF Phase I funding for the designated areas, as described in the Stipulation between the Company and ORS filed in this docket. The Company shall provide ORS with estimated timelines for each census block it proposes to serve. We conclude that providing the referenced reports to the Commission and to ORS provides a well-defined yardstick by which to measure the Company's progress towards the availability of voice and broadband service in the RDOF designated areas and is therefore an acceptable alternative to the two-year plan filing requirement.

5. The Commission also grants a waiver of Regulation 103-690.C.(b) to the extent it would prohibit designation of the Company as an ETC in an area smaller than a wire center. As described above, the FCC has established a mechanism to ensure the deployment of voice and broadband to unserved areas based on a granular analysis at the census block and location level to target funding to such areas. We agree with the Company that if the Commission were to deny the ETC designation the Company requests at the census block level in order to obtain available federal funding to serve the funded areas, those areas likely would remain unserved or underserved. Therefore, it is in the public

interest to grant a waiver of the portion of Regulation 103-690.C(b) that prohibits designating an ETC service area smaller than an entire wire center in order to allow designation of the Company as an ETC at the census block level as described herein.

6. The Commission waives the equal access requirement of Regulation 103-690.C.(a)(S), which requires an applicant to acknowledge that the FCC "may require" it to offer equal access to long distance carriers. The Commission's ETC regulations generally track the corresponding federal ETC regulations, and equal access is no longer a requirement under the FCC's universal service rules, previously existing under 47 C.F.R. § 54.202(a)(5). Compare 47 C.F.R § 54.202(a)(5) (2020) with 47 C.F.R § 54.202(a)(5) (2007).

7. Granting this Application furthers the goals and purposes of Section 254 of the Telecommunications Act of 1996 in that access to the federal Universal Service Fund will ensure expanded access to voice and broadband service.

8. Granting this Application allows the Company to build out unserved areas, bringing the benefits of voice and high-speed broadband to citizens in those areas; therefore, granting this Application is in the public interest.

**IV. IT IS THEREFORE ORDERED THAT:**

1. The Commission adopts and approves the Stipulation executed between the Company and ORS attached hereto as Order Exhibit A.

2. The Commission grants expedited review to allow the Company to meet the federal requirement to be designated as an ETC in the RDOF designated census blocks identified in Order Exhibit B not later than June 7, 2021.



3. The Company's request for designation as an ETC is granted, as of the effective date of this Order and in the requested areas identified in Order Exhibit B, for the purpose of providing voice telephony and broadband Internet access services as requested in the Application on the terms provided in the Stipulation.

4. The Company shall abide by its commitment to provide service throughout its ETC-designated service area to all customers making a reasonable request for service, including low-income customers.

5. The Company shall make available all reports it is required to file with the FCC in connection with RDOF Phase I funding for the designated areas, as described in the Stipulation between the Company and ORS filed in this docket. The Company shall provide ORS with estimated timelines for each census block it proposes to serve.

6. Except as provided in this Order, the Company shall meet the reporting and certification requirements for ETCs as outlined by the federal requirements and Regulation 103- 690.J, and file the annual reporting information with the Commission no later than June 30th of each year. A copy of this report shall also be provided to the ORS.

7. The Commission grants the Company's request for a waiver of Regulation 103-690.C.(a)(l)(B) requiring it to file a two-year plan describing proposed improvements or upgrades to its network, and of Regulation 103-690.1.B.(b)(l) regarding annual updates to the two-year plan.

8. The Commission also grants a waiver of Regulation 103-690.C.(b) to the extent it would prohibit designation of the Company as an ETC in an area smaller than a wire center.

9. The Commission further grants waiver of the equal access requirement set out in Regulation 103-690.C.(a)(S).

10. The Company shall provide voice and broadband services in conformity with 47 U.S.C.A. § 214(e)(2), 47 C.F.R. § 54.101 et seq. and Regulation 103-690.l(E)(a) and all requirements of the RDOF program.

11. The Commission may deny the Company's annual recertification as an ETC if the Commission finds that the Company has not used the high-cost federal support provided to the Company within the state only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

12. This Order shall remain in full force and effect until further order of the Commission.

BY ORDER OF THE COMMISSION:



A handwritten signature in black ink, appearing to read "Tom Ervin", is written over a horizontal line.

Thomas J. "Tom" Ervin, Commissioner  
Public Service Commission of  
South Carolina

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2021- 21- C**

**March 15, 2021**

IN RE:    Application of Horry Telephone Cooperative,    )  
          Incorporated for Designation as an Eligible    ) **STIPULATION**  
          Telecommunications Carrier in Certain        )  
          Census Blocks in Georgetown and Marion     )  
          Counties for Purposes of Receiving Federal  
          Rural Digital Opportunity Fund ("RDOF"),  
          Phase I Support

This Stipulation is made by and among the South Carolina Office of Regulatory Staff ("ORS") and Horry Telephone Cooperative, Inc. ("Company" or "Applicant") (collectively referred to as the "Parties" or sometimes individually as a "Party").

Whereas, Applicant is seeking designation as an Eligible Telecommunications Carrier ("ETC") in 189 eligible census blocks located in Georgetown County and 85 eligible census blocks located in Marion County in order to receive federal universal service support under Sections 214 and 254 of the Federal Telecommunications Act of 1996 and pursuant to the Federal Communications Commission's ("FCC") Rural Digital Opportunity Fund Phase I (904) Auction;

Whereas, the Application was filed pursuant to § 214(e) of the Communications Act of 1934, and the rules and regulations of the Public Service Commission of South Carolina ("Commission") and the FCC;

Whereas, ORS is a statutory party to this action. See S.C. Code Ann. § 58-4-10(B);

Whereas, no other comments or petitions to intervene were received in response to the notice of filing;

Whereas, in support of its Application and request for expedited review of this matter, the Applicant has filed an Affidavit attesting to the truth and accuracy of the Application and testimony;

Whereas, the Applicant seeks a waiver of the Commission two-year plan regulation and the regulation that requires designation on a wire center basis so that the requested area will conform with FCC census block area designation;

Whereas, the Federal Communications Commission ("FCC") released FCC 11-161 Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board ("USF/ICC Transformation Order") in an effort to comprehensively reform and modernize the high cost program within the universal service fund and the intercarrier compensation system to reposition support for networks capable of providing both voice and broadband services and created the Rural Digital Opportunity Fund ("RDOF");

Whereas, the Applicant identified services areas in price cap carriers' service areas in incumbent markets which were unserved, and which could be served by the Applicant by constructing new facilities funded by the federal RDOF plan;

Whereas, the Applicant participated in RDOF Auction, and the FCC awarded support to Applicant through the competitive bidding process;

Whereas, Applicant was among the provisional winning bidder and will receive \$729,554.50 over a ten-year period to build a network capable of providing gigabit broadband service upon completion of certain post-auction requirements;

Whereas, one of these requirements is for Applicant to be designated as an ETC in each state that it received RDOF in the funded areas by June 7, 2021;

Whereas, 47 C.F.R. § 54.101(a)(1) defines voice telephony services eligible for universal service support as services that provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E. of this part;

Whereas, Section 54.101(a)(2) defines broadband Internet access services eligible for universal service support as services that provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service;

Whereas, the FCC does not require the Applicant to submit a five-year plan for proposed network improvements and upgrades and no longer requires ETCs provide equal access;

Whereas the FCC has adopted more specific measures to track deployment, including annual reporting of service to geocoded locations and certifications of compliance with benchmark milestones, provided a "more defined yardstick by which to measure their progress towards the universal availability of voice and broadband service" in winning bidders designated service areas;

Whereas, Applicant is required to maintain a functional network in emergency situations;

Whereas, Applicant is required to commit to objective measures to protect consumers;

Whereas, Applicant is required to offer local usage plans comparable to the one offered by the incumbent in the service areas for which it seeks designation, in compliance with Commission Regulation 103-690.C.(a)(4);

Whereas, the FCC has undertaken a granular analysis, at the census block and location level, which are smaller areas than the wire center level, to target funding to unserved and underserved areas and Applicant seeks a waiver of Commission Regulation 103-690.C.(b) to the extent it would prohibit designation of Applicant as an ETC in an area smaller than a wire center;

WHEREFORE, in the spirit of compromise, the Parties hereby stipulate and agree to the following terms and conditions:

1. As an ETC, Applicant agrees to provide voice and broadband service pursuant Section 214(e)(1) of the Communications Act of 1934, as amended and Section 54.201(d) of the rules of the FCC require ETCs to, throughout their service areas for which designation is received, (1) offer the services supported by federal universal service support mechanisms, (2) either using its own facilities or a combination of its own facilities and resale of another carrier's services, and to (3) advertise the availability of such services and the charges using media of general distribution.
2. As an ETC, Applicant agrees that it must offer the services that are supported by universal support mechanisms, which are voice telephony services and broadband service as defined in Section 54.101 of the FCC's Rules, either through its own facilities or a combination of its own facilities and resale of another carrier's facilities in areas where it seeks ETC designation.

3. As an ETC, Applicant agrees to provide voice grade access to its customers through interconnection of Applicant facilities and the public switched telephone network.
4. As an ETC, Applicant agrees that it will offer Lifeline discounts to qualifying customers and comply with federal Lifeline requirements in fulfillment of the requirement that ETCs offer Lifeline discounts to qualifying customers and to offer toll limitation service at no charge to qualifying customers in the funded areas, unless the Lifeline service does not distinguish between toll and non-toll calls in the pricing of the service.
5. As an ETC, Applicant agrees to provide access to emergency services for its customers in remote and currently unserved and underserved portions of the 274 census blocks for which it seeks ETC designation.
6. As an ETC, Applicant agrees to provide ORS with the list of census blocks and the estimated cost provided to the FCC to upgrade the census block groups within seven days of ETC designation.
7. As an ETC, Applicant agrees to provide estimated timelines for each census block it proposes to serve.
8. As an ETC, Applicant agrees to offer a Lifeline Broadband option for each census block that it has been awarded RDOF upon completion of construction to that census block.
9. As an ETC, Applicant will advertise these offerings in a manner that is designed to fully inform potential customers of the supported services available to them, to disclose all associated rates, and to ensure that qualifying low-income individuals are informed about the availability and cost of Lifeline programs.

10. As an ETC, Applicant, pursuant to FCC regulations, must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) demonstrate its ability to remain functional in emergency situations; (3) demonstrate that it will satisfy consumer protection and service quality standards.
11. As an ETC, the Applicant agrees to report to the FCC and the Commission on a quarterly or annual basis the number of unfulfilled requests for service, as required.
12. As an ETC, Applicant certifies that it will comply with the service requirements applicable to the supported voice and broadband services that it will be offering in the Funded Areas, including the requirements for the RDOF auction program.
13. As an ETC, Applicant commits to making available to the Commission and ORS all reports it is required to file with the FCC in connection with RDOF Phase I funding for the designated areas.
14. As an ETC, Applicant commits that its voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations and complies with the FCC's backup power requirements.
15. As an ETC, Applicant certifies that it is complying with applicable service quality standards and consumer protection rules, including complying with Lifeline service standards pursuant to 47 C.F.R. § 54.408 including minimum broadband speed requirements, data usage allowance, and accessibility to WIFI devices.
16. As an ETC, Applicant agrees to offer a voice local calling plan comparable to the calling plan offered by the incumbent local exchange carrier in the designated areas.



17. As an ETC, Applicant acknowledges that the FCC may require Applicant to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.
18. As an ETC, Applicant agrees that it is a common carrier and has the obligations of a common carrier for the provision of voice and broadband service within South Carolina.
19. Subject to the provisions set forth herein and compliance with regulatory assessments such as the Dual Party Relay Fund, the South Carolina Universal Service Fund, and gross receipts, where applicable, ORS does not oppose the Application of Horry Telephone Cooperative, Inc. for designation as an eligible telecommunications carrier.
20. As an ETC, Applicant will not "cream-skim," that is, target low-cost portions of a rural incumbent LEC's service area in which uneconomically high levels of support are available.
21. ORS is charged by law with the duty to represent the public interest of South Carolina. Pursuant to S.C. Code § 58-4-10(B) (Supp. 2018) 'public interest' means the concerns of the using and consuming public with respect to public utility services, regardless of the class of customer and preservation of continued investment in and maintenance of utility facilities so as to provide reliable and high quality utility services.
22. ORS believes the Stipulation reached among the Parties serves the public interest as defined above. The Parties agree that this Stipulation is reasonable, is in the public interest, and is in accordance with law and regulatory policy.
23. ORS agrees to support expedited review for the Applicant as it has agreed to the terms and conditions of ETC designation. This Stipulation contains the complete agreement

between the Parties regarding the Application. There are no other terms or conditions to which the Parties have agreed.

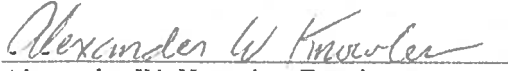
24. The Parties agree to advocate that the Commission accept and approve this Stipulation in its entirety as a fair, reasonable and full resolution of all issues in the above-captioned proceeding and that the Commission take no action inconsistent with its adoption. The Parties further agree to cooperate in good faith with one another in recommending to the Commission that this Stipulation be accepted and approved by the Commission. The Parties agree to use reasonable efforts to defend and support any Commission order issued approving this Stipulation and the terms and conditions contained herein.
25. The Parties represent that the terms of this Stipulation are based upon full and accurate information known as of the date this Stipulation is executed. If, after execution, either Party is made aware of information that conflicts with, nullifies, or is otherwise materially different than that information upon which this Stipulation is based, either Party may withdraw from the Stipulation with written notice to the other Party.
26. The Parties agree that signing this Stipulation will not constrain, inhibit, impair or prejudice their arguments or positions held in other collateral proceedings, nor will it constitute a precedent or evidence of acceptable practice in future proceedings. If the Commission declines to approve the Stipulation in its entirety, then any Party desiring to do so may withdraw from the Stipulation in its entirety without penalty or obligation.
27. This Stipulation shall be interpreted according to South Carolina law.
28. The above terms and conditions fully represent the agreement of the Parties hereto. Therefore, each Party acknowledges its consent and agreement to this Stipulation by affixing its signature or by authorizing counsel to affix his or her signature to this

document where indicated below. Counsel's signature represents his or her representation that his or her client has authorized the execution of the agreement. Facsimile signatures and email signatures shall be as effective as original signatures to bind any party. This document may be signed in counterparts, with the original signature pages combined with the body of the document constituting an original and provable copy of this Stipulation. The Parties agree that in the event any Party should fail to indicate its consent to this Stipulation and the terms contained herein, then this Stipulation shall be null and void and will not be binding on any Party.

[PARTY SIGNATURES TO FOLLOW ON SEPARATE PAGES]

WE AGREE:

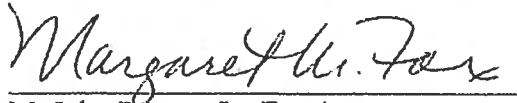
Representing South Carolina Office of Regulatory Staff



Alexander W. Knowles, Esquire  
South Carolina Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
Phone: (803) 737-0889  
Email: [aknowles@ors.sc.gov](mailto:aknowles@ors.sc.gov)

WE AGREE:

Representing Horry Telephone Cooperative, Inc.

A handwritten signature in cursive script, reading "Margaret M. Fox", is written over a horizontal line.

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
Burr & Forman L.L.P.  
Post Office Box 11390  
Columbia, SC 29211  
Phone: (803) 799-9800  
Email: jbowen@burr.com  
Email: pfox@burr.com

## EXHIBIT A

### CENSUS BLOCK GROUPS AND NUMBER OF LOCATIONS:

Block ID Area	State	County	Number of Locations
450439201003	SC	Georgetown County	566
450439202011	SC	Georgetown County	9
450439202012	SC	Georgetown County	1
450439202014	SC	Georgetown County	1
450439202021	SC	Georgetown County	177
450439202022	SC	Georgetown County	16
450439203011	SC	Georgetown County	62
450439203012	SC	Georgetown County	2
450439204001	SC	Georgetown County	422
450439205022	SC	Georgetown County	2
450439205041	SC	Georgetown County	6
450439207003	SC	Georgetown County	1
450439207004	SC	Georgetown County	36
450439208001	SC	Georgetown County	79
450439208002	SC	Georgetown County	67
450439208003	SC	Georgetown County	66
450679504003	SC	Marion County	19
450679505003	SC	Marion County	138
450679505004	SC	Marion County	15
450679505005	SC	Marion County	172
450679506001	SC	Marion County	410

### ELIGIBLE CENSUS BLOCKS WITHIN THE CENSUS BLOCK GROUPS (I.E. CENSUS BLOCKS FOR WHICH HTC SEEKS ETC DESIGNATION):

Census_id	Block_id	State	County
450439201003	450439201003001	SC	Georgetown
450439201003	450439201003002	SC	Georgetown
450439201003	450439201003003	SC	Georgetown
450439201003	450439201003006	SC	Georgetown
450439201003	450439201003007	SC	Georgetown
450439201003	450439201003008	SC	Georgetown
450439201003	450439201003010	SC	Georgetown
450439201003	450439201003016	SC	Georgetown
450439201003	450439201003019	SC	Georgetown
450439201003	450439201003020	SC	Georgetown
450439201003	450439201003022	SC	Georgetown
450439201003	450439201003023	SC	Georgetown
450439201003	450439201003024	SC	Georgetown

Census id	Block id	State	County
450439201003	450439201003025	SC	Georgetown
450439201003	450439201003027	SC	Georgetown
450439201003	450439201003028	SC	Georgetown
450439201003	450439201003029	SC	Georgetown
450439201003	450439201003030	SC	Georgetown
450439201003	450439201003031	SC	Georgetown
450439201003	450439201003035	SC	Georgetown
450439201003	450439201003038	SC	Georgetown
450439201003	450439201003039	SC	Georgetown
450439201003	450439201003040	SC	Georgetown
450439201003	450439201003041	SC	Georgetown
450439201003	450439201003042	SC	Georgetown
450439201003	450439201003043	SC	Georgetown
450439201003	450439201003045	SC	Georgetown
450439201003	450439201003046	SC	Georgetown
450439201003	450439201003047	SC	Georgetown
450439201003	450439201003048	SC	Georgetown
450439201003	450439201003049	SC	Georgetown
450439201003	450439201003050	SC	Georgetown
450439201003	450439201003051	SC	Georgetown
450439201003	450439201003052	SC	Georgetown
450439201003	450439201003054	SC	Georgetown
450439201003	450439201003056	SC	Georgetown
450439201003	450439201003057	SC	Georgetown
450439202011	450439202011014	SC	Georgetown
450439202011	450439202011033	SC	Georgetown
450439202011	450439202011038	SC	Georgetown
450439202011	450439202011040	SC	Georgetown
450439202011	450439202011043	SC	Georgetown
450439202011	450439202011044	SC	Georgetown
450439202012	450439202012006	SC	Georgetown
450439202014	450439202014056	SC	Georgetown
450439202021	450439202021002	SC	Georgetown
450439202021	450439202021003	SC	Georgetown
450439202021	450439202021005	SC	Georgetown
450439202021	450439202021011	SC	Georgetown
450439202021	450439202021012	SC	Georgetown
450439202021	450439202021013	SC	Georgetown
450439202021	450439202021014	SC	Georgetown
450439202021	450439202021016	SC	Georgetown
450439202021	450439202021020	SC	Georgetown
450439202021	450439202021021	SC	Georgetown
450439202021	450439202021024	SC	Georgetown

Census_id	Block_id	State	County
450439202021	450439202021034	SC	Georgetown
450439202021	450439202021052	SC	Georgetown
450439202021	450439202021053	SC	Georgetown
450439202021	450439202021067	SC	Georgetown
450439202021	450439202021078	SC	Georgetown
450439202022	450439202022001	SC	Georgetown
450439203011	450439203011043	SC	Georgetown
450439203011	450439203011044	SC	Georgetown
450439203011	450439203011057	SC	Georgetown
450439203011	450439203011093	SC	Georgetown
450439203011	450439203011097	SC	Georgetown
450439203011	450439203011109	SC	Georgetown
450439203011	450439203011127	SC	Georgetown
450439203011	450439203011133	SC	Georgetown
450439203011	450439203011145	SC	Georgetown
450439203011	450439203011147	SC	Georgetown
450439203011	450439203011148	SC	Georgetown
450439203011	450439203011150	SC	Georgetown
450439203011	450439203011151	SC	Georgetown
450439203011	450439203011173	SC	Georgetown
450439203012	450439203012023	SC	Georgetown
450439204001	450439204001006	SC	Georgetown
450439204001	450439204001022	SC	Georgetown
450439204001	450439204001023	SC	Georgetown
450439204001	450439204001036	SC	Georgetown
450439204001	450439204001045	SC	Georgetown
450439204001	450439204001046	SC	Georgetown
450439204001	450439204001056	SC	Georgetown
450439204001	450439204001057	SC	Georgetown
450439204001	450439204001060	SC	Georgetown
450439204001	450439204001061	SC	Georgetown
450439204001	450439204001067	SC	Georgetown
450439204001	450439204001071	SC	Georgetown
450439204001	450439204001073	SC	Georgetown
450439204001	450439204001074	SC	Georgetown
450439204001	450439204001078	SC	Georgetown
450439204001	450439204001085	SC	Georgetown
450439204001	450439204001086	SC	Georgetown
450439204001	450439204001090	SC	Georgetown
450439204001	450439204001098	SC	Georgetown
450439204001	450439204001101	SC	Georgetown
450439204001	450439204001124	SC	Georgetown
450439204001	450439204001126	SC	Georgetown



Census_id	Block_id	State	County
450439204001	450439204001128	SC	Georgetown
450439204001	450439204001129	SC	Georgetown
450439204001	450439204001133	SC	Georgetown
450439204001	450439204001134	SC	Georgetown
450439204001	450439204001135	SC	Georgetown
450439204001	450439204001139	SC	Georgetown
450439204001	450439204001140	SC	Georgetown
450439204001	450439204001141	SC	Georgetown
450439204001	450439204001142	SC	Georgetown
450439204001	450439204001143	SC	Georgetown
450439204001	450439204001144	SC	Georgetown
450439204001	450439204001145	SC	Georgetown
450439204001	450439204001146	SC	Georgetown
450439204001	450439204001150	SC	Georgetown
450439204001	450439204001153	SC	Georgetown
450439204001	450439204001155	SC	Georgetown
450439204001	450439204001157	SC	Georgetown
450439204001	450439204001158	SC	Georgetown
450439204001	450439204001160	SC	Georgetown
450439204001	450439204001162	SC	Georgetown
450439204001	450439204001164	SC	Georgetown
450439204001	450439204001173	SC	Georgetown
450439204001	450439204001180	SC	Georgetown
450439204001	450439204001194	SC	Georgetown
450439204001	450439204001199	SC	Georgetown
450439204001	450439204001206	SC	Georgetown
450439205022	450439205022051	SC	Georgetown
450439205022	450439205022067	SC	Georgetown
450439205041	450439205041058	SC	Georgetown
450439205041	450439205041061	SC	Georgetown
450439207003	450439207003012	SC	Georgetown
450439207004	450439207004003	SC	Georgetown
450439207004	450439207004005	SC	Georgetown
450439207004	450439207004011	SC	Georgetown
450439207004	450439207004013	SC	Georgetown
450439207004	450439207004079	SC	Georgetown
450439207004	450439207004113	SC	Georgetown
450439208001	450439208001006	SC	Georgetown
450439208001	450439208001011	SC	Georgetown
450439208001	450439208001012	SC	Georgetown
450439208001	450439208001013	SC	Georgetown
450439208001	450439208001018	SC	Georgetown
450439208001	450439208001025	SC	Georgetown
450439208001	450439208001027	SC	Georgetown

Census_id	Block_id	State	County
450439208001	450439208001028	SC	Georgetown
450439208001	450439208001029	SC	Georgetown
450439208001	450439208001030	SC	Georgetown
450439208001	450439208001042	SC	Georgetown
450439208001	450439208001044	SC	Georgetown
450439208001	450439208001045	SC	Georgetown
450439208001	450439208001046	SC	Georgetown
450439208001	450439208001047	SC	Georgetown
450439208002	450439208002012	SC	Georgetown
450439208002	450439208002022	SC	Georgetown
450439208002	450439208002029	SC	Georgetown
450439208002	450439208002030	SC	Georgetown
450439208002	450439208002031	SC	Georgetown
450439208002	450439208002035	SC	Georgetown
450439208002	450439208002036	SC	Georgetown
450439208002	450439208002038	SC	Georgetown
450439208002	450439208002050	SC	Georgetown
450439208002	450439208002051	SC	Georgetown
450439208002	450439208002065	SC	Georgetown
450439208002	450439208002066	SC	Georgetown
450439208002	450439208002067	SC	Georgetown
450439208002	450439208002068	SC	Georgetown
450439208002	450439208002148	SC	Georgetown
450439208002	450439208002149	SC	Georgetown
450439208002	450439208002195	SC	Georgetown
450439208002	450439208002218	SC	Georgetown
450439208003	450439208003006	SC	Georgetown
450439208003	450439208003030	SC	Georgetown
450439208003	450439208003033	SC	Georgetown
450439208003	450439208003043	SC	Georgetown
450439208003	450439208003058	SC	Georgetown
450439208003	450439208003060	SC	Georgetown
450439208003	450439208003063	SC	Georgetown
450439208003	450439208003065	SC	Georgetown
450439208003	450439208003071	SC	Georgetown
450439208003	450439208003077	SC	Georgetown
450439208003	450439208003084	SC	Georgetown
450439208003	450439208003086	SC	Georgetown
450439208003	450439208003088	SC	Georgetown
450439208003	450439208003090	SC	Georgetown
450439208003	450439208003100	SC	Georgetown
450439208003	450439208003124	SC	Georgetown
450439208003	450439208003134	SC	Georgetown
450439208003	450439208003201	SC	Georgetown

Census_id	Block_id	State	County
450439208003	450439208003211	SC	Georgetown
450439208003	450439208003231	SC	Georgetown
450679504003	450679504003003	SC	Marion
450679504003	450679504003005	SC	Marion
450679504003	450679504003006	SC	Marion
450679504003	450679504003039	SC	Marion
450679504003	450679504003040	SC	Marion
450679505003	450679505003022	SC	Marion
450679505003	450679505003024	SC	Marion
450679505003	450679505003025	SC	Marion
450679505003	450679505003027	SC	Marion
450679505003	450679505003031	SC	Marion
450679505003	450679505003043	SC	Marion
450679505003	450679505003044	SC	Marion
450679505003	450679505003045	SC	Marion
450679505003	450679505003049	SC	Marion
450679505003	450679505003051	SC	Marion
450679505003	450679505003052	SC	Marion
450679505003	450679505003053	SC	Marion
450679505004	450679505004043	SC	Marion
450679505004	450679505004050	SC	Marion
450679505005	450679505005030	SC	Marion
450679505005	450679505005031	SC	Marion
450679505005	450679505005032	SC	Marion
450679505005	450679505005036	SC	Marion
450679505005	450679505005041	SC	Marion
450679505005	450679505005042	SC	Marion
450679505005	450679505005043	SC	Marion
450679505005	450679505005044	SC	Marion
450679505005	450679505005045	SC	Marion
450679505005	450679505005046	SC	Marion
450679505005	450679505005047	SC	Marion
450679505005	450679505005048	SC	Marion
450679505005	450679505005049	SC	Marion
450679505005	450679505005051	SC	Marion
450679505005	450679505005053	SC	Marion
450679505005	450679505005055	SC	Marion
450679505005	450679505005057	SC	Marion
450679505005	450679505005059	SC	Marion
450679506001	450679506001002	SC	Marion
450679506001	450679506001003	SC	Marion
450679506001	450679506001004	SC	Marion
450679506001	450679506001006	SC	Marion

Census id	Block id	State	County
450679506001	450679506001008	SC	Marion
450679506001	450679506001009	SC	Marion
450679506001	450679506001011	SC	Marion
450679506001	450679506001012	SC	Marion
450679506001	450679506001016	SC	Marion
450679506001	450679506001019	SC	Marion
450679506001	450679506001023	SC	Marion
450679506001	450679506001024	SC	Marion
450679506001	450679506001028	SC	Marion
450679506001	450679506001029	SC	Marion
450679506001	450679506001031	SC	Marion
450679506001	450679506001032	SC	Marion
450679506001	450679506001034	SC	Marion
450679506001	450679506001035	SC	Marion
450679506001	450679506001037	SC	Marion
450679506001	450679506001038	SC	Marion
450679506001	450679506001040	SC	Marion
450679506001	450679506001041	SC	Marion
450679506001	450679506001042	SC	Marion
450679506001	450679506001043	SC	Marion
450679506001	450679506001044	SC	Marion
450679506001	450679506001045	SC	Marion
450679506001	450679506001046	SC	Marion
450679506001	450679506001048	SC	Marion
450679506001	450679506001050	SC	Marion
450679506001	450679506001051	SC	Marion
450679506001	450679506001052	SC	Marion
450679506001	450679506001054	SC	Marion
450679506001	450679506001055	SC	Marion
450679506001	450679506001056	SC	Marion
450679506001	450679506001057	SC	Marion
450679506001	450679506001059	SC	Marion
450679506001	450679506001060	SC	Marion
450679506001	450679506001062	SC	Marion
450679506001	450679506001063	SC	Marion
450679506001	450679506001065	SC	Marion
450679506001	450679506001066	SC	Marion
450679506001	450679506001067	SC	Marion
450679506001	450679506001069	SC	Marion
450679506001	450679506001070	SC	Marion
450679506001	450679506001074	SC	Marion
450679506001	450679506001076	SC	Marion
450679506001	450679506001078	SC	Marion
450679506001	450679506001082	SC	Marion